

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Scott A. Holman,

Case No.: 20-CV-00224 (PJS/LIB)

Plaintiff,

v.

Lauri A. Ketola, individually and in her official capacity as County Attorney for Carlton County; County of Carlton, Minnesota, a municipal corporation; Kerry E. Kolodge, individually and in his official capacity as Cloquet City Council Member; and City of Cloquet, Minnesota, a municipal corporation,

**Motion for Summary Judgment by  
Defendants Kerry E. Kolodge, City of  
Cloquet and Lauri A. Ketola, in her  
CAB capacity**

Defendants

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Pursuant to Fed. R. Civ. P. 56, and based upon all the files, records, and proceedings herein, including Affidavits and Memorandum of Law, Defendants Kerry E. Kolodge, City of Cloquet and Lauri A. Ketola in her CAB capacity (City Defendants) move this Court for an Order granting summary judgment dismissal of the Complaint and all of Plaintiff's claims therein on the merits and with prejudice.

After the now dismissed County Attorney designated Plaintiff a *Brady-Giglio* officer and advised that she would not prosecute matters in which Plaintiff was involved, a quorum of Defendant City of Cloquet's City Council, terminated Plaintiff's law enforcement position on June 14, 2019. Although the complaint states seven claims in total against City Defendants, the thrust of the complaint is that Plaintiff claims that City Defendants

retaliated against him for Facebook comments he posted in 2017 criticizing then CAB member Lauri Ketola and City Councilmember Kerry Kolodge. Summary judgment dismissal of all claims against City Defendants is merited because all actions taken by City Defendants were lawful, based on rational and legitimate reasons, and carried out in properly noticed and privileged forums.

Dated: March 30, 2022

**Kennedy & Graven, Chartered**

By: /s/ Jessica E. Schwie

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**Attorneys for Defendants Kerry E. Kolodge, City of Cloquet, and Lauri Ketola in her capacity as an appointed volunteer to the CAB**